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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RONALD OTIS BOYD II, an individual,
Plaintiff,

vs.

MB PROSOUND AND STAGING, INC., a
Foreign Corporation; DOE DEFENDANTS I-
XX, inclusive; DOE MB PROSOUND
EMPLOYEES I-XX; and ROE
CORPORATIONS I-XX, inclusive,
Defendant(s).

Case No. 2:23-cv-02092-APG-MDC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES AND AMEND CURRENT
DISCOVERY PLAN AND SCHEDULING
ORDER [ECF No. 17].**

Second Request

The parties hereby stipulate and agree, subject to this Court's approval, to extend the current discovery deadlines and amend the Discovery Plan and Scheduling Order (ECF No. 17) by sixty (60) days. This is the second request to extend the discovery deadlines in this matter. The parties are in agreement that the requested extension is in the interest of all parties to allow the parties to efficiently litigate this case. The parties submit that this extension is sought in good faith and will not unduly delay these proceedings.

I. Discovery Completed To Date

1. Plaintiff served his initial disclosures on January 26, 2024.
2. Defendant served its initial disclosure on January 24, 2024.

3. Defendant served Plaintiff with record authorizations to be signed and returned on February 16, 2024. Plaintiff provided authorizations on March 19, 2024.

4. On February 23, 2024, Plaintiff served a Subpoena Duces Tecum to ESPN Productions, Inc. for video footage of the incident.

5. On March 22, 2024, Plaintiff responded to written discovery requests served by Defendant.

6. On April 10, 2024, Defendant responded to written discovery request served by Plaintiff.

7. On April 12, 2024, Defendant conducted Plaintiff's deposition.

8. Both parties have served supplemental disclosures of witnesses and documents.

II. Discovery Left to Be Completed

1. Expert discovery.

2. Treating doctor depositions.

3. Defendant's deposition (30(b)(6)).

4. Other percipient witnesses as needed.

III. Reasons for Requested Extension

Plaintiff provided HIPPA authorizations to obtain medical records on March 19, 2024. Defendant timely submitted requests to all of Plaintiff's providers. Defendant still has not received all of Plaintiff's records from all of Plaintiff's providers, namely, Plaintiff's complete chiropractic records. Additional time is necessary to gather the remaining records to utilize in the expert review of records. Additionally, the parties are working to schedule depositions of Defendant's witnesses. Accordingly, the parties respectfully request a brief sixty-day extension to complete all necessary discovery.

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	Current	Proposed
Amend Pleadings/Add Parties	July 10, 2024	September 9, 2024
Initial Expert Disclosures	July 10, 2024	September 9, 2024
Rebuttal Expert Disclosures	September 9, 2024	November 8, 2024
Dispositive Motions	November 7, 2024	January 6, 2025
Joint Pretrial Order ¹	December 9, 2024	February 7, 2025

IV. Current and Proposed Deadlines

Accordingly, the parties respectfully request that the Court enter an order approving the proposed discovery schedule as set forth above. This request is made in good faith and will not cause undue delay.

DATED July 10, 2024

DATED July 10, 2024

MAINOR ELLIS, LLP

**WILSON, ELSER, MOSKOWITZ
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IT IS SO ORDERED.



 UNITED STATES MAGISTRATE JUDGE

¹ In the event a dispositive motion is timely filed, the date for filing the joint pre-trial order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motion, or otherwise by further Court order.